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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SUZANNE CRUISE CREATIVE SERVICES, INC., a Kansas corporation, and LAURIE COOK, an individual,

Plaintiffs,

-v-

BARRINGTON STUDIOS LTD, a New Hampshire corporation, ANTHONY SPERANDEO, an individual, GEORGE LENCSAK, an individual, SHOPKO STORES OPERATING CO., LLC, a Delaware Limited Liability Company, FRED MEYER STORES, INC., a Delaware corporation, WAL-MART STORES, INC., a Delaware corporation, CVS CAREMARK CORPORATION, a Delaware corporation, DOLLAR GENERAL CORPORATION, a Tennessee corporation, DOLLAR TREE, INC., a Virginia corporation, BIG LOTS, INC., a Delaware corporation, and Does 1-20,

Defendants.

CIVIL ACTION

Index No: 10-cv-4293 (PKC)

ECF Filed

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT pursuant to Federal Rule of Civil Procedure 12(b)(2), or in the alternative, pursuant to Rule 12(b)(6), upon the annexed Declaration of Kristina M. Mentone, Esq., dated January 26, 2011, and all exhibits annexed thereto, the accompanying Memorandum of Law, and all other pleadings and proceedings herein, defendant George Lencsak ("Lencsak") , by and through his attorneys, Reed Smith LLP, will move this Court at a date and time to be designated by the Court, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, for an order dismissing Plaintiffs' claims set forth in the Amended Complaint against Lencsak, with prejudice, pursuant to Federal Rule of Civil Procedure 12(b)(2), or in the alternative, pursuant to Rule 12(b)(6), as well as for such further relief as this Court deems just and proper.

Dated: January 26, 2011
New York, New York

REED SMITH LLP

By: _s/ Kristina Mentone__________
Kristina M. Mentone (KM 1184)

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TO: All Counsel of Record (*VIA ECF*)